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March 30, 2022

**BY EMAIL & ECF**

Honorable Raymon E. Reyes, Jr.  
Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Rm. N208  
Brooklyn, New York 11201

Re: Seth Gordon v. Brytavious Chambers, et al [1:20-cv-00696-AMD/RER]

Dear Magistrate Reyes:

We are counsel for the Defendant Daniel Hernandez in the above-entitled action.

This is a joint request by the parties to request an additional thirty (30) day extension of the fact discovery deadline in this case, currently set to expire on March 31, 2022 pursuant to this Court's order dated February 1, 2022.

Document discovery has been completed. The parties – Plaintiff Seth Gordon and Defendant Daniel Hernandez – have scheduled their depositions for March 30, 2022 (Hernandez) and April 14 (Gordon).

I have conferred with counsel for plaintiff, and he has consented to this request. We remain available to respond to any questions concerning this request at the Court's convenience.

Respectfully,

MELONI & McCAFFREY APC



By: \_\_\_\_\_  
Robert S. Meloni

cc: William Knowlton, Esq. (by email)